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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jane Doe LS 333 v. Uber Technologies, Inc., et al., No. 3:23-cv-05930-CRB

Jane Doe LS 397 v. Uber Technologies, Inc., et al., No. 3:24-cv-05864-CRB

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF
CHRISTOPHER V. COTTON IN SUPPORT
OF DEFENDANTS' ADMINISTRATIVE
MOTION TO SEAL PERSONAL
IDENTIFYING INFORMATION
CONTAINED IN AN EXHIBIT TO
DEFENDANTS' MOTION TO COMPEL
COMPLIANCE WITH COURT ORDERS &
TO RESET DEADLINE FOR CERTAIN
DEPOSITIONS**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, declare as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P. (“Shook”), counsel of record for
3 Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or
4 “Defendants”). I offer this Declaration in the above-captioned matter in support of Uber’s Administrative
5 Motion to Seal Personal Identifying Information Contained in an Exhibit to Defendants’ Motion to
6 Compel Compliance with Court Orders & to Reset Deadline for Certain Depositions (the “Sealing
7 Motion”).

8 2. Counsel for Uber previously met and conferred with the Nachawati and Chaffin Luhana
9 firms concerning the sealing of personally identifying information (“PII”) in connection with Uber’s
10 Motion for Entry of (1) an Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
11 Receipts Should Not Be Dismissed with Prejudice and (2) a Case Management Order Addressing Certain
12 Plaintiffs Who Have Not Submitted Receipts. ECF 3602-1. Counsel indicated that they did not oppose
13 sealing PII, including counsel from Chaffin Luhana who serves as part of Plaintiffs’ Leadership in this
14 matter. The Court granted Uber’s motion to seal. ECF 3616. Part of the sealed information contained in
15 the instant Sealing Motion is a subset of the PII that has already been filed under seal and unopposed.

16 3. Counsel for Uber also previously made diligent efforts to meet and confer with Plaintiffs’
17 counsel concerning the sealing of PII in connection with Uber’s Motion for Entry of an Order to Show
18 Cause Why 6 Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed with
19 Prejudice. Those efforts are detailed in my declaration in support of Uber’s motion to seal the PII in that
20 motion. ECF 3783-1. Counsel for Uber have not received any communications from any Plaintiff’s
21 counsel regarding opposition to the sealing of the material detailed in ECF 3783. Part of the sealed
22 information in the Sealing Motion is a subset of the PII that was included in Uber’s prior motion to seal.

23 I declare under penalty of perjury under the laws of the State of Missouri and the laws of the United
24 States of America that the foregoing is true and correct.

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Executed on October 22, 2025, in Kansas City, Missouri.

SHOOK, HARDY & BACON L.L.P.

/s/ Christopher V. Cotton

CHRISTOPHER V. COTTON

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